App. No. 09/785,861
Amendment Dated: August 27, 2004
Reply to Office Action of April 29, 2004

REMARKS/ARGUMENTS

In the Office Action dated April 29, 2004, claims 9 and 29 are objected to because of informalities. Claims 16 and 30 are objected to for being incomplete sentences. Claims 2-9 are rejected under 35 U.S.C. 112, second paragraph. Claims 1, 2, 4-7, 10-12, and 17 are rejected under 35 U.S.C. 102(e). Claims 22, 23, and 25-30 are rejected under 35 U.S.C. 102(b). Claim 3, 8, 9, 13-16, 18, 19, 20, 21, and 24 are rejected under 35 U.S.C. 103(a).

I.   Claim Objections

1.)   Claims 9 and 29 were rejected for an informality that regarded the use of "if" in the claim. The language of claims 9 and 29 have been amended to overcome the objection without further limiting the scope of the claims. Applicant respectfully requests that the claim objections therefore be withdrawn.

2.)   Claim 9 is objected to under 37 CFR 1.75(c) as being of improper dependent form for failing to further limit the subject matter of the previous claim.

3.)   Claim 16 and 30 are object to because they are incomplete sentences. The language of claims 16 and 30 have been amended to overcome the objection without further limiting the scope of the claims. Applicant respectfully requests that the claim objections therefore be withdrawn.

II.   Rejections Under 35 U.S.C. 112

4.)   Claims 2-9 are rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Office Action states that "the computer-implemented medium" in first line of each claim does not have antecedent basis. Claims 2-9 have been amended to overcome the rejection without further limiting the scope of the claims.

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III.   Rejections Under 35 U.S.C. 102

3.)   Claims 1, 2, and 4-7 are rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Aravamudhan et al. (U.S. Patent No. 6,563,919). Applicant respectfully disagrees as described below.

With regard to claim 1, claim 1 recites, "wherein the second format is consistent with an underlying storage mechanism of the mobile device." Aravamudhan et al. discloses analyzing and categorizing information needed by the UMM (Unified Mobility Manager) and providing normalized data which is readable and usable by the UMM. (Aravamudhan et al. column 7, lines 51-52 and column 8, lines 8-10) The data in Aravamudhan et al. is not translated from one format to another. This fact is proven by Figure 4 in Aravamudhan et al. that shows that the normalized data is different for each of the protocols. Figure 4 illustrates that the data has not been translated, but merely categorized for ease of reference. This cannot be considered translation of a property, but merely recording a property in a table. Since the normalized data of Aravamudhan et al. is not translated, it cannot considered to be in a second format that could be considered consistent with an underlying storage mechanism. Accordingly, Aravamudhan et al. does not anticipate claim 1.

Furthermore, claim 1 recites, "wherein the storage component is configured to translate the properties from the first format to a second format." As previously stated, Aravamudhan et al. does not disclose translation of any properties. Since Aravamudhan et al. does not disclose translation of a property as disclosed in the claimed invention, Aravamudhan et al. does not anticipate claim 1.

With regard to claims 2 and 4-7, claims 2 and 4-7 are dependent upon claim 1. Aravamudhan et al. does not anticipate claims 2 and 4-7 for at least the reasons stated above with regard to claim 1.

4.)   Claim 10 is rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Mosher et al. (U.S. Patent No. 6,029,143). Applicant respectfully disagrees as described below.

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With regard to claim 10, claim 10 recites, "wherein the second format is consistent with an underlying storage mechanism of a mobile device on which the instructions are executed." Mosher et al. does not recite a translation of a property into a second format that is consistent with an underlying storage mechanism of the mobile device. In fact, Mosher et al. does not make any disclosure of converting the data from sites other than to say that it is configured to do so and that the programming of the computer system makes it possible. (Mosher et al. column 6, lines 10-16) This disclosure is insufficient to anticipate the claimed invention. Accordingly, Mosher et al. does not anticipate claim 10.

Furthermore, claim 10 recites, "receiving a request to store a property of a message within a data store." In contrast, Mosher et al. discloses "receiving ordering data from sites directly into memory." (Mosher et al. column 6, lines 8-9) The ordering data of Mosher et al. is not equivalent to a property of a message as provided by the claimed invention and Mosher et al. does not disclose receipt of a request to store a property of a message. There is no disclosure of the receipt of such a request throughout the prior art reference. Accordingly, since Mosher et al. does not disclose this limitation of claim 10, Mosher et al. does not anticipate claim 10.

5.)   Claims 10-12 and 17 are rejected in the Office Action under 35 U.S.C. 102(e) as being anticipated by Kennedy (U.S. Patent No. 6,330,589). Applicant respectfully disagrees as described below.

With regard to claim 10, claim 10 recites, "wherein the second format is consistent with an underlying storage mechanism of a mobile device on which the instructions are executed." In contrast, Kennedy recites, "an exemplary embodiment of the present invention provides the benefit of converting the conversation threading scheme of news messages to a conversation threading scheme that can be managed by an MAPI format-sensitive application." MAPI is not a format that is consistent with an underlying storage mechanism of a mobile device. As disclosed in the specification, one example of the present invention maps message properties from MAPI to a Windows CE database format. (Specification, page 6, lines 13-23) The claimed invention therefore translates the properties to a format consistent with an underlying storage mechanism

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of a mobile device (e.g., Windows CE database format). Since Kennedy does not disclose this limitation, Kennedy does not anticipate claim 10.

With regard to claims 11, 12 and 17, claims 11, 12, and 17 are dependent upon claim 10. Kennedy does not anticipate claims 11, 12, and 17 for at least the reasons stated above with regard to claim 10.

6.)   Claims 22, 23, and 25-30 are rejected in the Office Action under 35 U.S.C. 102(b) as being anticipated by Guck (U.S. Patent No. 5,858,415). Applicant respectfully disagrees as described below.

With regard to claim 22, claim 22 recites, "wherein the second format is consistent with an underlying storage mechanism of a mobile device on which the instructions are executed." In contrast, Guck merely discloses converting an object to a format in which it is requested and states nothing about the format of a property being consistent with an underlying storage mechanism. Since Guck does not disclose this limitation, Guck does not anticipate claim 22.

Furthermore, claim 22 recites, "receiving a request to retrieve a property of a message from a data store." In contrast, Guck discloses "..transforms the *document's content* to a format compatible with the request." (Guck column 4, lines 56-58) (*emphasis added*) The document content of Guck is not equivalent to a property of a message as provided by the claimed invention and Guck does not disclose receipt of a request to retrieve a property of a message. There is no disclosure of the receipt of such a request throughout the prior art reference. Accordingly, since Guck does not disclose this limitation of claim 22, Guck does not anticipate claim 22.

With regard to claims 23 and 25-30, claims 23 and 25-30 are dependent upon claim 22. Guck does not anticipate claims 23 and 25-30 for at least the reasons stated above with regard to claim 22.

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IV.   Rejections Under 35 U.S.C. 103

7.)   Claim 3 is rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Aravamudhan et al. in view of Kennedy(2) (U.S. Patent No. 6,134,582). Applicant respectfully disagrees as described below.

Claim 3 is dependent upon claim 1. As stated above with regard to claim 1, Aravamudhan et al. does not teach or suggest all of the claim limitations of claim 1. In particular, Aravamudhan et al. does not teach or suggest "wherein the second format is consistent with an underlying storage mechanism of the mobile device." The addition of Kennedy(2) in combination with Aravamudhan et al. does not cure this deficiency. Neither Kennedy(2) or Aravamudhan et al. teach or suggest all of the claim limitations of claim 1. Accordingly, for at least the reasons stated for claim 1, claim 3 is also patentable over Aravamudhan et al. in view of Kennedy(2).

8.)   Claims 8 and 9 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Aravamudhan et al. in view of Buckley (U.S. Patent No. 6,035,327). Applicant respectfully disagrees as described below.

Claims 8 and 9 are dependent upon claim 1. As stated above with regard to claim 1, Aravamudhan et al. does not teach or suggest all of the claim limitations of claim 1. The addition of Buckley et al. in combination with Aravamudhan et al. does not cure this deficiency. Neither Buckley et al. or Aravamudhan et al. teach or suggest all of the claim limitations of claim 1. Accordingly, for at least the reasons stated for claim 1, claims 8 and 9 are also patentable over Aravamudhan et al. in view of Buckley et al..

9.)   Claims 13-16 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Mosher et al. in view of Aravamudhan et al. Applicant respectfully disagrees as described below.

Claims 13-16 are dependent upon claim 10. As stated above with regard to claim 10, Mosher et al. does not teach or suggest all of the claim limitations of claim 10. . In particular,

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Mosher et al. does not teach or suggest "wherein the second format is consistent with an underlying storage mechanism of a mobile device on which the instructions are executed." The addition of Aravamudhan et al. in combination with Mosher et al. does not cure this deficiency. Neither Mosher et al. or Aravamudhan et al. teach or suggest all of the claim limitations of claim 10. Accordingly, for at least the reasons stated for claim 1, claim 3 is also patentable over Mosher et al. in view of Aravamudhan et al..

10.)   Claims 18 and 19 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Kennedy in view of Thurlow et al. (U.S. Patent No. 6,057,841). Applicant respectfully disagrees as described below.

Claims 18 and 19 are dependent upon claim 10. As stated above with regard to claim 10, Kennedy does not teach or suggest all of the claim limitations of claim 10. The addition of Thurlow et al. in combination with Kennedy does not cure this deficiency. Neither Thurlow et al. or Kennedy teach or suggest all of the claim limitations of claim 1. Accordingly, for at least the reasons stated for claim 10, claims 18 and 19 are also patentable over Kennedy in view of Thurlow et al..

11.)   Claims 20 and 21 are rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Kennedy in view of Peters et al. (U.S. Patent No. 6,292,795). Applicant respectfully disagrees as described below.

Claims 20 and 21 are dependent upon claim 10. As stated above with regard to claim 10, Kennedy does not teach or suggest all of the claim limitations of claim 10. The addition of Peters et al. in combination with Kennedy does not cure this deficiency. Neither Peters et al. or Kennedy teach or suggest all of the claim limitations of claim 1. Accordingly, for at least the reasons stated for claim 10, claims 20 and 21 are also patentable over Kennedy in view of Peters et al..

12.)   Claim 24 is rejected in the Office Action under 35 U.S.C. 103(a) as being unpatentable over Guck in view of an Official Notice that art that databases can store information in a plurality of tables. Applicant respectfully disagrees as described below.

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Claim 24 is dependent upon claim 22. As stated above with regard to claim 22, Guck does not teach or suggest all of the claim limitations of claim 22. In particular, Guck does not teach or suggest "wherein the second format is consistent with an underlying storage mechanism of the mobile device." Despite the Office Notice, Guck does not teach or suggest all of the claim limitations of claim 22. Accordingly for at least the reasons stated for claim 22, claim 24 is also patentable over Guck in view of the Office Notice set forth in the Office Action.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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